

EPA Comment Number: 550-102

Received: February 14, 2000

To: Homepage Oppts/DC/USEPA/US@EPA
cc:

Subject: Comments on Food Safety Strategic Plan - EPA Docket No. Opp-00550

February 14, 2000

Food and Drug Administration
Dockets Management Branch (HFA-305)
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: FDA Docket No. 97N-0074 - Draft Preliminary Food Safety Strategic Plan prepared by the President's Council on Food Safety

The American Society for Microbiology (ASM) is pleased to comment on the Draft Preliminary Food Safety Strategic Plan prepared by the President's Council on Food Safety. The American Society for Microbiology is the largest single life science society in the world, with over 42,000 members.

The safety of the U.S. food supply is a matter of major importance to the entire nation. Hence, ASM commends the Administration for taking important steps during the past several years to improve overall safety of the U.S. food supply, such as by implementing better procedures for detecting and reporting food-borne pathogens as well as by mandating manufacturers and food processors to implement the Hazard Analysis Critical Control Point (HAACP) approach to ensuring safer food products.

These efforts need to be continued, extended, and reinforced. For example, the Centers for Disease Control and Prevention (CDC) PulseNet system for monitoring and identifying specific food-borne pathogens has proved itself a valuable addition to the broader system for ensuring U.S. food safety. The PulseNet system requires a firm commitment for continuing support from the Administration. Moreover, the federal government needs to encourage the development of similarly effective, innovative programs to contribute broadly to overall U.S. food safety. In addition, the Administration needs to take further steps to improve the safety of imported foods, particularly fruits and vegetables that often arrive at U.S. ports contaminated by pathogens following exposure of the produce to tainted water supplies.

In general, ASM finds the Administration's draft strategic plan to be thoughtful and carefully constructed. However, in several instances,

particularly in the draft "Vision Statement," references to the safety of the food supply are so absolute as to be misleading to the public. For example, the text now reads: "Consumers can be confident that food is safe." Notwithstanding that this sentence represents part of an idealized view for the U.S. food supply, ASM is concerned that such statements may be read literally and thus misunderstood. In short, efforts will always be needed to ensure that the food supply is safer, but there is no ironclad way to make it absolutely safe.

ASM notes that the draft plan in several sections omits the mention of plants in the context of food safety and food safety research. Hence, ASM urges the Administration to review the draft and to revise it, where appropriate, to incorporate additional references to plants, plant-associated pathogens, and similar topics that fall within the broad framework of food safety.

ASM is concerned that the draft plan does not provide an approach for ranking food-borne pathogens in terms of their actual and potential impacts on public health. Setting such a hierarchy is an essential step when marshalling federal resources for ensuring food safety and protecting the public health. ASM recommends that the draft strategic plan be revised in such a way that it incorporates plans for a comprehensive, quantitative hazard analysis of the known agents of food-borne disease. As an example, pathogens such as Salmonella are responsible for causing more than 1.3 million food-related infections per year and perhaps 550 deaths, whereas other pathogens, such as Vibrio cholerae, are responsible for as few as 50 cases per year and no deaths. It is essential to develop a far-fuller understanding of the relationships among these and other food-borne pathogens for the purpose of setting useful national food-safety priorities.

In terms of administering federal food safety programs, ASM agrees with the National Academy of Sciences that the best option for this purpose is to bring the disparate elements in the current system into a single agency with a single director at its head. This option corresponds to the "New Consolidated, Stand Alone Food Agency" described in the draft strategic plan. Although this approach is the best of the several options that are presented, others that lead to better, more centralized coordination represent an important improvement over the current federal system, which is too diffuse and thus lacking in coherence and centralized authority.

Sincerely,

Gail H. Cassell, Ph.D., Chair, Public and Scientific Affairs Board
Michael T. Osterholm, Ph.D., M.P.H., Chair, Committee on Public Health
Anne K. Vidaver, Ph.D., Chair, Committee on Agricultural and Food Microbiology
Michael P. Doyle, Ph.D., Chair, Subcommittee on Food Safety